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May 10, 2023

**Via CM/ECF**

The Honorable Gabriel W. Gorenstein  
U.S. District Court for the Southern District of New York  
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New York, NY 10007

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Re: *Donna Wood, et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS) (GWG)

Dear Judge Gorenstein:

We represent Defendant Mike Bloomberg 2020, Inc. (the “Campaign”) in the above-referenced matter. We write, pursuant to the Court’s Order dated today (Dkt. 345)<sup>1</sup>, to advise that the Campaign elects to have its letter docketed as Dkt. 343, and all accompanying exhibits (Dkts. 343-1 – 343-13), serve as its moving papers in connection with the Campaign’s motion to compel Plaintiffs to produce unredacted versions of certain communications that Plaintiffs withheld.

Pursuant to Rule 2.B of this Court’s Individual Practices, the parties have agreed on the following briefing schedule:

- Plaintiffs’ opposition shall be filed on Friday, May 19, 2023.
- The Campaign’s reply shall be filed on Thursday, May 25, 2023.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ *Elise M. Bloom*

Elise M. Bloom

cc: All Counsel of Record (via CM/ECF)

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<sup>1</sup> Although the Court’s Order indicated that this letter would be submitted by Plaintiffs, the Campaign, as the party seeking relief in Dkt. 343, believes that this was a clerical error and that the Court intended for the Campaign to do so.